

UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: NATIONAL FOOTBALL
LEAGUE PLAYERS' CONCUSSION
INJURY LITIGATION

No. 2:12-md-02323-AB
MDL No. 2323

Kevin Turner and Shawn Wooden,
*on behalf of themselves and
others similarly situated,*

Plaintiffs,

v.

National Football League and
NFL Properties LLC,
*successor-in-interest to
NFL Properties, Inc.,*

Defendants.

No. 14-cv-00029-AB

THIS DOCUMENT RELATES TO:

*Lewis v. Kansas City Chiefs Football
Club, LLC*

No. 14-cv-01995-AB

**DECLARATION OF CAITLIN E. GRUSAUSKAS IN SUPPORT OF THE
KANSAS CITY CHIEFS FOOTBALL CLUB, LLC'S MEMORANDUM OF LAW
IN OPPOSITION TO SETTLEMENT CLASS MEMBER CYNTHIA
PHILLIPS' MOTION TO INTERVENE**

Caitlin E. Grusauskas declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am an associate with the firm of Paul, Weiss, Rifkind, Wharton & Garrison LLP, 1285 Avenue of the Americas, New York, New York 10019-6064, counsel for the Kansas City Chiefs Football Club, LLC (the "Chiefs"). I make this declaration, on

personal knowledge, in support of the Chiefs' Memorandum of Law in Opposition to Settlement Class Member Cynthia Phillips' Motion to Intervene.

2. Attached as Exhibit 1 is a true and correct copy of Peter Barzilai's December 3, 2013 article, "Ex-Kansas City Chiefs sue team over concussion damage," from *USA Today*, available at <https://www.usatoday.com/story/sports/nfl/chiefs/2013/12/03/kansas-city-chiefs-concussion-lawsuit/3859149/>.

3. Attached as Exhibit 2 is a true and correct copy of Ken Belson's December 3, 2013 article, "Five Former N.F.L. Players Sue the Chiefs Over Head Injuries," from the *New York Times*, available at <https://www.nytimes.com/2013/12/04/sports/football/five-former-nfl-players-sue-the-kansas-city-chiefs-over-head-injuries.html>.

4. Attached as Exhibit 3 is a true and correct copy of Darren Heitner's December 3, 2013 article, "Five Former Kansas City Chiefs Players File Concussion Lawsuit Against Team," from *Forbes*, available at <https://www.forbes.com/sites/darrenheitner/2013/12/03/five-former-kansas-city-chiefs-players-file-concussion-lawsuit-against-team/#4fee323719a6>.

5. Attached as Exhibit 4 is a true and correct copy of the Associated Press's December 23, 2013 article, "Nine Ex-Chiefs Join Suit vs. Team," posted on ESPN and available at http://www.espn.com/nfl/story/_/id/10185951/nine-former-kansas-city-chiefs-join-brain-injury-lawsuit.

6. Attached as Exhibit 5 is a true and correct copy of A.J. Daulerio's May 14, 2008 article, "Has Troubled Joe Phillips Resurfaced Online?," from Deadspin, available at <https://deadspin.com/390416/has-troubled-joe-phillips-resurfaced-online>.

7. Attached as Exhibit 6 is a true and correct copy of the April 22, 2015 article, "Judge OKs 65-year deal over NFL concussions; could cost \$1 billion," from the *Observer-Reporter*, available at https://observer-reporter.com/sports/pro_sports/judge-oks--year-deal-over-nfl-concussions-couldcost/article_9b656bd1-e6d2-5479-9be8-2451895e9ae3.html.

8. Attached as Exhibit 7 is a true and correct copy of the November 19, 2014 article, "Lawyer asks judge to OK NFL concussion deal," from the *Observer-Reporter*, available at https://observer-reporter.com/sports/pro_sports/lawyer-asks-judge-to-ok-nfl-concussiondeal/article_4b242526-dafe-561a-b2e4-22a8d923b40d.html.

9. Attached as Exhibit 8 is a true and correct copy of Ken Belson's April 22, 2015 article, "Judge Approves Deal in N.F.L. Concussion Suit," from the *New York Times*, available at <https://www.nytimes.com/2015/04/23/sports/football/nfl-concussion-settlement-is-given-final-approval.html>.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on September 27, 2018
New York, New York



Caitlin E. Grusauskas